

Message

From: Enns S (Steve) at Aera [SJEnns@aeraenergy.com]
Sent: 1/28/2019 3:07:33 PM
To: Hambrick, Amy [Hambrick.Amy@epa.gov]
Subject: RE: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

You are correct, it's a state regulation. I'm dealing with 3 different government agencies that all think they need to regulate the same thing. Gets confusing. Don't worry about it.

From: Hambrick, Amy [mailto:Hambrick.Amy@epa.gov]
Sent: Monday, January 28, 2019 7:01 AM
To: Enns S (Steve) at Aera <SJEnns@aeraenergy.com>
Subject: [External] RE: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Hi Steve-

I apologize for the delayed response due to the government shutdown. Our office reopened today. I want to make sure you are referring to the regulation at 40 CFR part 60 subpart OOOOa (https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=9d79f9e68d78beadb14bf25dd3d1df10&mc=true&r=SUBPART&n=sp40.8.60.oooo_0a) OR the proposed amendments to 40 CFR part 60 subpart OOOOa (<https://www.govinfo.gov/content/pkg/FR-2018-10-15/pdf/2018-20961.pdf>) ? Why I ask is that I searched the regulation for the phrase you referenced and I am not finding that phrase. You may be referring to your State's requirements so you may need to contact them for a response. Please let me know if I can help to located a state contact for you. If I misinterpreted your question, please don't hesitate to correct me and I'll do my best to get you a response or direct you to someone who can give you a response.

Regards,

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: drupal_admin@epa.gov <drupal_admin@epa.gov> on behalf of steve via EPA <no-reply@epa.gov>
Sent: Thursday, December 27, 2018 1:22 PM
To: AirAction
Subject: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Submitted on 12/27/2018 1:22PM
Submitted values are:

Name: steve

Email Address: sjenns@aeraenergy.com

Comments:

Why can't we use a PID to screen for leaks under the new methane regulation?

"Subarticle 13: Greenhouse Gas Emission Standards for
Crude Oil and Natural Gas Facilities"

"(g) At least once each calendar quarter, all components shall be tested for leaks of total hydrocarbons in units of parts per million volume (ppmv) calibrated as methane in accordance with US EPA Reference Method 21 (October 1, 2017) excluding the use of PID instruments."